

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**LABORERS' PENSION FUND and)
LABORERS' WELFARE FUND OF THE)
HEALTH AND WELFARE DEPARTMENT)
OF THE CONSTRUCTION AND GENERAL)
LABORERS' DISTRICT COUNCIL OF)
CHICAGO AND VICINITY, JAMES S.)
JORGENSEN,)**

Plaintiffs,

v.

)

;

AFFIDAVIT OF KAREN I. ENGELHARDT

STATE OF ILLINOIS)
)
COUNTY OF COOK)

Karen I. Engelhardt being first duly sworn on oath, deposes and states as follows:

1. I am an attorney and a shareholder at the law firm of Allison, Slutsky & Kennedy, P.C., counsel for plaintiffs Laborers' Pension Fund and Laborers' Welfare Fund of the Health and Welfare Department of the Construction and General Laborers' District Council of Chicago and Vicinity (the "Laborers' Funds") in the action against Dixon Interiors, Inc. This affidavit is submitted to document attorneys' fees and costs incurred by the Laborers' Funds for work performed in connection with obtaining contributions owed for the period from December 14, 2007 to the present.

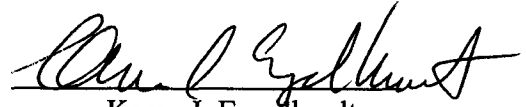
2. This firm bills the Laborers' Funds on an hourly basis for services rendered to the Funds, at a rate of \$175.00 per hour for shareholders, \$150.00 per hour for associates, and \$75.00

per hour for clerks/paralegals. In this cause, records for legal work on this matter were kept contemporaneously and are attached hereto as Exhibit 1.

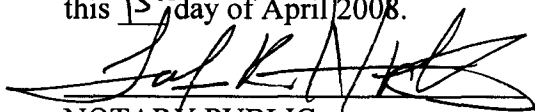
3. Exhibit 1 hereto sets forth the time expended from December 14, 2007 through April 14, 2008, by the firm's attorneys and paralegals in this matter. Counsel includes time preparing this affidavit and computing all amounts owed in the proposed judgment order on April 15, 2008. As set forth in that Exhibit, the Laborers' Funds have incurred legal fees to my firm in this matter in the amount of \$1,195.00.

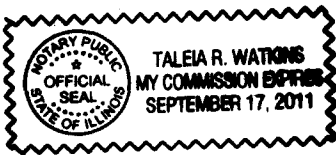
4. In addition, the Laborers' Funds have incurred the following costs in the prosecution of this matter totaling \$410.00, which include filing and service fees.

FURTHER AFFIANT SAYETH NOT.


Karen I. Engelhardt

Subscribed and sworn to before me
this 15th day of April 2008.


NOTARY PUBLIC



4/15/2008
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Slip Listing

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Selection Criteria

Slip Classification Open
 Clie. Selection Include: Labrs P&W 1
 Refe. Selection Include: Dixon Interiors
 Slip Date 12/14/2007 - 4/15/2008

Rate Info - identifies rate source and level

Slip ID	Dates and Time	Posting Status	Description	Attorney Activity Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
146796	TIME		12/14/2007	Josiah Groff	0.10	150.00	15.00
			Billed	Legal Services	0.00	C@2	
		G:14578	1/18/2008	Labrs P&W 1	0.00		
			Call w/B. Mortimer	Dixon Interiors	0.00		
146803	TIME		12/17/2007	Josiah Groff	0.50	150.00	75.00
			Billed	Legal Services	0.00	C@2	
		G:14578	1/18/2008	Labrs P&W 1	0.00		
			Conf. w/KIE re reports needed; letter to B. Mortimer; conf. w/KIE re case status	Dixon Interiors	0.00		
147104	TIME		1/3/2008	K. Engelhardt	0.10	175.00	17.50
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Call w/ B. Mortimer	Dixon Interiors	0.00		
147118	TIME		1/4/2008	K. Engelhardt	0.40	175.00	70.00
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Calls w/ B. Mortimer, M. Christopher	Dixon Interiors	0.00		
147216	TIME		1/7/2008	K. Engelhardt	0.30	175.00	52.50
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Calls w/ M. Christopher, B. Mortimer	Dixon Interiors	0.00		
147653	TIME		1/9/2008	K. Engelhardt	0.10	175.00	17.50
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Call w/ M. Christopher	Dixon Interiors	0.00		
147805	TIME		1/21/2008	K. Engelhardt	0.20	175.00	35.00
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Calls to B. Mortimer, M. Christopher	Dixon Interiors	0.00		
147939	TIME		1/22/2008	K. Engelhardt	0.10	175.00	17.50
			Billed	Legal Services	0.00	C@1	
		G:14596	2/14/2008	Labrs P&W 1	0.00		
			Call w/ W. Mortimer	Dixon Interiors	0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
147946	TIME		1/23/2008	K. Engelhardt		0.20	175.00	35.00
	Billed	G:14596	2/14/2008	Legal Services		0.00	C@1	
	Call w/ B. Mortimer			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
148048	TIME		1/26/2008	Wes Kennedy		0.10	175.00	17.50
	Billed	G:14596	2/14/2008	Legal Services		0.00	C@1	
	Work on status reports			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
148092	TIME		1/27/2008	K. Engelhardt		0.10	175.00	17.50
	Billed	G:14596	2/14/2008	Legal Services		0.00	C@1	
	Report to Trustees			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
148113	TIME		1/27/2008	K. Engelhardt		0.00	175.00	0.00
	Billed	G:14596	2/14/2008	Legal Services		0.00	C@1	
	work on charts			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
148197	TIME		1/28/2008	Wes Kennedy		0.10	175.00	17.50
	Billed	G:14596	2/14/2008	Legal Services		0.00	C@1	
	Work on status reports			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
149063	TIME		2/4/2008	K. Engelhardt		0.60	175.00	105.00
	Billed	G:14618	3/6/2008	Legal Services		0.00	C@1	
	Call w/ M. Christopher; draft complaint			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
149747	TIME		2/4/2008	Andre Smith		1.00	75.00	75.00
	Billed	G:14618	3/6/2008	Legal Services		0.00	C@3	
	Prepare case: summons, appearance, civil cover sheet and exhibit labels			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
149750	TIME		2/14/2008	Andre Smith		0.50	75.00	37.50
	Billed	G:14618	3/6/2008	Legal Services		0.00	C@3	
	Draft letter and prepare for service			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
149827	TIME		2/25/2008	K. Engelhardt		0.20	175.00	35.00
	Billed	G:14618	3/6/2008	Legal Services		0.00	C@1	
	Call w/ M. Christopher; review service of summons			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		
150767	TIME		3/4/2008	Josiah Groff		0.10	150.00	15.00
	Billed	G:14643	4/11/2008	Legal Services		0.00	C@2	
	Efiling summons and return			Labrs P&W 1		0.00		
				Dixon Interiors		0.00		

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Slip ID	Dates and Time	Posting Status	Description	Attorney Activity	Client Reference	Units DNB Time	Rate Rate Info	Slip Value
						Est. Time	Bill Status	
						Variance		
150672	TIME			K. Engelhardt		0.10	175.00	17.50
	3/5/2008			Legal Services		0.00	C@1	
	Billed	G:14643	4/11/2008	Labrs P&W 1		0.00		
	Call w/ M. Christopher			Dixon Interiors		0.00		
150916	TIME			K. Engelhardt		0.30	175.00	52.50
	3/14/2008			Legal Services		0.00	C@1	
	Billed	G:14643	4/11/2008	Labrs P&W 1		0.00		
	Letter to W. Mortimer			Dixon Interiors		0.00		
151294	TIME			K. Engelhardt		0.10	175.00	17.50
	3/25/2008			Legal Services		0.00	C@1	
	Billed	G:14643	4/11/2008	Labrs P&W 1		0.00		
	Call w/ W. Mortimer			Dixon Interiors		0.00		
152086	TIME			K. Engelhardt		1.20	175.00	210.00
	4/7/2008			Legal Services		0.00	C@1	
	WIP			Labrs P&W 1		0.00		
	Draft M. Christopher affidavit; call w/ M. Christopher, work on motion, letter to M. Christopher			Dixon Interiors		0.00		
152357	TIME			K. Engelhardt		1.00	175.00	175.00
	4/11/2008			Legal Services		0.00	C@1	
	WIP			Labrs P&W 1		0.00		
	Complete motion, draft order, notice of motion; letter to M. Christopher			Dixon Interiors		0.00		
152366	TIME			K. Engelhardt		0.10	175.00	17.50
	4/14/2008			Legal Services		0.00	C@1	
	WIP			Labrs P&W 1		0.00		
	Call w/ M. Christopher			Dixon Interiors		0.00		
Grand Total								
				Billable		7.50		1145.00
				Unbillable		0.00		0.00
				Total		7.50		1145.00

— 125.00
 \$ 1,020.00
 + 4/15/08 175.00
 Total 1,195.00